

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c)	
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<i>In re:</i> HovBros Burlington, LLC, Debtor,	Case No.: 16-13892(JNP) Chapter: 11
<i>In re:</i> HovBros Fries Mill, LLC, Debtor,	Case No.: 16-13893(JNP) Chapter: 11
And	Case No.: 16-13894(JNP) Chapter: 11
<i>In re:</i> Sunrise Hovcare, L.P., Debtor.	
<i>In re:</i> HovBros Roesville, LLC, Debtor.	Case No.: 16-23024(JNP) Chapter: 11

**DEBTORS' MOTION FOR AN ORDER
AUTHORIZING JOINT ADMINISTRATION**

HovBros Burlington, LLC ("Burlington"), HovBros Fries Mill, LLC ("Fries Mill"), Sunrise Hovcare, LP ("Sunrise"), and HovBros Roesville, LLC ("Roesville") (herein collectively referred to as the "Debtors") by and through their counsel, Ciardi Ciardi & Astin, hereby submit the Debtors' Motion for an Order Authorizing Joint Administration and in support thereof and respectfully represent:

Background

1. On March 2, 2016 (the "Petition Date") Burlington, Fries Mill, and Sunrise separately filed Voluntary Petitions for relief under Chapter 11 of Title 11 of the United States Code, as amended (the "Bankruptcy Code"). Similarly, on July 6, 2016, Roesville filed a Voluntary Petition for relief under Chapter 11 of Title 11 of the Bankruptcy Code.

2. The above captioned cases have each been assigned to the Honorable Jerrold N. Poslusny, Jr. United States Bankruptcy Judge.

3. The Debtors have continued in possession of their assets and property as Debtors-in-Possession.

4. The Debtors conduct their business at the same location. Additionally, the Debtors have the same secured creditors, many of the same unsecured creditors and a common business purpose.

Relief Requested

5. Federal Rule of Bankruptcy Procedure 1015(b)(4) provides that "[i]f a joint petition or two or more petitions are pending in the same court by ... (4) a debtor and an affiliate, the court may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b)(4).

6. The related Debtors maintain that if their estates are administered jointly, they would be in a better position to reorganize their financial affairs, file and confirm a feasible Plan of Reorganization and provide a distribution to unsecured creditors of both estates.

7. The Debtors also maintain that in preparation of this Motion, they have given consideration to protecting creditors of different estates against potential conflicts of interest. However, the Debtors are very confident that since the Debtors have the same secured

creditors, many of the same unsecured creditors and a common business purpose, that a conflict of interest between creditors of different estates will not arise.

8. By and through this Motion the Debtors seek to maintain separate records and tax identities but desire a lead docket number with respect to the above captioned proceedings and the ability to file a Joint Plan of Reorganization. Therefore, the granting of the Motion, and thus the joint administration of these cases, will enhance the judicial economy with respect to the above captioned cases.

9. The Debtors submit that the Joint Administration of these cases should be maintained under the case number assigned to the Debtor, HovBros Burlington, LLC, Case No. 16-13892(JNP).

WHEREFORE, the Debtors hereby respectfully request that this Court enter an Order, substantially in the form attached hereto, authorizing Joint Administration of the Debtors' bankruptcy cases pursuant to Bankruptcy Rule 1015(a).

Respectfully submitted,

Dated:

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